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7 ATTORNEYS FOR PLAINTIFF
FEDERAL TRADE COMMISSION

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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.

Case No. C08-1718-VRW

STIPULATION FOR ORDER
EXTENDING DEADLINE FOR FILING
RESPONSIVE PLEADINGS AND
~~PROPOSED~~ ORDER

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20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade
22 Commission's (the "FTC") Complaint is currently due on Monday, May 4, 2009;

23 WHEREAS the parties have recently concluded several days of intensive settlement
24 discussions and are currently negotiating the terms of a settlement agreement;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses
26 to Plaintiff's Complaint in order to finalize those settlement negotiations;

27 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and
28 Defendants, through their respective counsel, that Defendants' time to move, answer or

otherwise respond to the Complaint shall be and hereby is extended to and including August 3, 2009; and

IT IS FURTHER STIPULATED that the Case Management Conference, currently scheduled for June 25, 2009, at 3:30 p.m., be rescheduled to September 24, 2009, at 3:30 p.m., and that the date for filing the Case Management Statement be extended to September 14, 2009.

Dated: 4/30/09

/s/

MICHAEL C. LYNCH
D. REED FREEMAN
KELLEY DRYE & WARREN LLP
ATTORNEY FOR DEFENDANTS

Dated: 4/30/09

/s/

JANICE L. CHARTER
DAVID M. NEWMAN
THOMAS N. DAHDOUN
ATTORNEYS FOR PLAINTIFF

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 5, 2009

VAUGHN R. WALKER
UNITED STATES DISTRICT COURT JUDGE

